Electrolux

October 29, 2004

CALIFORNIA ENERGY COMMISSION
1516 NINTH ST, MAIL STATION 4
SACRAMENTO CA 95814-5512

Reference: Docket #04-AAER-1

Dear Sir or Madam:

This letter is to express our opposition to the referenced docket as proposed, for the following reasons:

1. The test procedure CEC is referencing is from the EPA Energy Star program on External Power Supplies. EPA has already realized this procedure does not fit with appliance battery chargers. The test procedure does not appropriately measure efficiency of constant current chargers. It seeks to set a "no-load" limit on appliance chargers, which will force costly changes, but save no energy for California consumers, since appliance battery chargers spend basically no time in "no-load" condition.

2. The test procedure is inappropriate for most appliance battery chargers because it measures the energy characteristics of just the direct plug-in adaptor, but not the full battery charging circuit. In many appliance battery chargers, the circuitry for battery charging is not only in the direct plug-in adaptor, but also in the end product.

3. Process. CEC expanded the definition to include battery chargers in September 2004, and has not fully announced its intention in the proposed regulations in May. This does not afford companies the full opportunity to respond to proposed CEC regulations. Companies and organizations have not had an opportunity to research the energy impacts of this regulation and payback to the citizens of California.

4. The CEC Definition is confusing, arbitrary and not based on sound logic. CEC has exempted certain types of battery chargers based on a February 2004 EPA Energy Star proposed definition that has subsequently been discontinued by EPA. The latest CEC definition would include some appliance battery chargers and not others that may actually be in the same product family. The definition is based on the geographical location of the power conversion circuit, not on the function. For example, if a cordless vacuum has batteries that are integral with the vacuum and attached by cord to the power adaptor, this may be within the CEC definition of an EPS. However, if the batteries for the vacuum are removed to charge in a cup-type charger, the vacuum and its adaptor are not within the CEC definition of an EPS. The CEC should change the definition in Section 1602 for "Single-voltage external AC to DC power supplies" to be consistent with the definition in the EPA Energy Star program.

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5. The test procedure, when applied to appliance battery chargers, has several flaws. It is based on comparing the nameplate watts or VA characteristics of input with output and establishes an arbitrary minimum efficiency. The more important characteristic for battery chargers is the power consumed during charging and maintenance mode. This test procedure does not measure this. Thus, the effect of this test procedure is to demand some level of efficiency of the power conversion process but not reduce energy demand to the consumer or utility. The Test Procedure in Section 1604 (u) (1) should reference the latest draft of EPA's Energy Star program and be consistent.

6. Design standard. The proposed CEC regulation is design limiting. The CEC and its consultants are mandating a standard based on forcing manufacturers to use specific power conversion designs: Switch Mode Power Supplies or Integrated Circuit battery chargers. The true net energy savings of these are minimal; according to our industry sources, some of these are not available for NiCd battery chargers; and, the costs will push the payback to California citizens well out of reach.

7. Availability. The efficiency advocates have stated that IC or SMPS chargers exist. This may be true but are primarily confined to higher-priced electronics products. Our corporation supports energy savings with power supply consumption. We are internally working toward a no-load maximum energy use of 1 watt. The 0.5 watt limit proposed will be cost prohibitive to attain.

Sincerely,

John Huebsch
Mgr. Testing & Certification

JH:jb

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